

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

In re: )  
 ) Chapter 11  
STEWARD HEALTH CARE SYSTEM, )  
LLC, *et al.*, ) Case No. 24-90213 (CML)  
Debtors.<sup>1</sup> ) (Jointly Administered)  
 )  
 )  
 )  
Dr. Manisha Purohit, Dr. Diane Paggioli, )  
Dr. James D. Thomas, Dr. Thomas Ross, )  
Dr. Michael Regan, Dr. Peter Lydon, )  
Dr. Sridhar Ganda, and Dr. A. Ana Beesen, )  
for themselves and those similarly situated, )  
 )  
Plaintiffs, )  
 ) Misc. No. \_\_\_\_\_  
v. )  
 )  
Steward Health Care System LLC, )  
IASIS Healthcare, LLC, and )  
Patrick Lombardo, in his role as Executive )  
Vice President for Human Resources for )  
Steward Health Care System LLC; and )  
John and Jane Does, in their roles as )  
Committee Members and/or Management )  
Board Members, )  
 )  
Defendants. )  
 )

**DECLARATION OF CHRISTOPHER JOHNSON IN SUPPORT OF  
PARTICIPANTS' EMERGENCY MOTION FOR AN ORDER  
STAYING HEARING ON TURNOVER MOTION**

<sup>1</sup> A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://restructuring.ra.kroll.com/Steward>. The Debtors' service address for these chapter 11 cases is 1900 N. Pearl Street, Suite 2400, Dallas, Texas 75201.

I, Christopher Johnson, being over 18 years of age and competent in all respects to testify, having personal knowledge of the facts set forth below, and under penalties of perjury, hereby state, swear, and affirm the following:

1. I am co-counsel for Dr. Manisha Purohit, Dr. Diane Paggioli, Dr. James Thomas, Dr. Thomas Ross, Dr. Michael Regan, Dr. Peter Lydon, Dr. Sridhar Ganda, and Dr. A. Ana Beesen (collectively, the “**Participants**”), participants in certain deferred compensation plans sponsored by the debtors and debtors-in-possession in the above-captioned chapter 11 cases (the “**Debtors**”).

2. I am familiar with the facts, circumstances and proceedings in this case and submit this declaration in support of Participants’ *Emergency Motion for an Order Staying Hearing on Turnover Motion* (the “**Emergency Motion**”). In particular, I submit this declaration to expand upon the factual background set forth in the Emergency Motion regarding the pleadings filed in the chapter 11 bankruptcy case of Steward Health Care System, LLC, et. al, Bankruptcy Case No 24-90213, filed in the United States Bankruptcy Court for the Southern District of Texas (the “**Bankruptcy Case**”) and the class action complaint filed by the Participants, adversary case no. 25-03066 (the “**Adversary Proceeding**”).

3. Attached hereto as Exhibit 1 is a true and correct copy of *Debtors’ (I) Motion for an Order (A) Directing Trustees to Turn Over and Deliver Trust Assets or Proceeds Thereof to the Debtors, (B) Authorizing the Debtors to Exercise Ownership Rights Over Such Assets, (C) Authorizing Termination of Trusts, and (D) Granting Related Relief; and (II) Objection to Dr. Manisha Purohit’s Letter* [ECF. 3277].

4. Attached hereto as Exhibit 2 is a true and correct copy of the *Objection of Certain Participants to Debtors’ (I) Motion for an Order (A) Directing Trustees to Turn Over and Deliver Trust Assets or Proceeds Thereof to the Debtors, (B) Authorizing the Debtors to Exercise*

*Ownership Rights Over Such Assets, (C) Authorizing Termination of Trusts, and (D) Granting Related Relief; and (II) Objection to Dr. Manisha Purohit's Letter* [ECF. 3497].

5. Attached hereto as Exhibit 3 is a true and correct copy of the *Emergency Motion of Certain Participants for an Order Staying the Contested Matter Relating to the Turnover Motion* [ECF. 4089].

6. Attached hereto as Exhibit 4 is a true and correct copy of *Debtors' Reply to Objection of Certain Participants to Debtors' Motion to Turn Over Trust Assets* [ECF. 4105].

7. Attached hereto as Exhibit 5 is a true and correct copy of *Debtors' Objection to Rabbi Trust Motion Objectors' Motion to Stay* [ECF. 4144].

8. Attached hereto as Exhibit 6 and filed under seal is a true and correct copy of the *Complaint for Injunctive, Equitable, and Declaratory Relief and Request for Class Action* [Adversary ECF. 1].

9. Attached hereto as Exhibit 7 is a true and correct copy of the *Motion of Named Plaintiffs for an Order (I) Withdrawing the Reference and (II) Staying the Contested Matter Relating to the Turnover Motion* [Adversary ECF. 3].

10. Attached hereto as Exhibit 8 is a true and correct copy of the *Transcript of the March 7, 2025 hearing before the Hon. Christopher M. Lopez, United States Bankruptcy Court Judge on Debtors' (I) Motion for an Order (A) Directing Trustees to Turn Over and Deliver Trust Assets or Proceeds Thereof to the Debtors, (B) Authorizing the Debtors to Exercise Ownership Rights Over Such Assets, (C) Authorizing Termination of Trusts, and (D) Granting Related Relief; and (II) Objection to Dr. Manisha Purohit's Letter.*

11. Attached hereto as Exhibit 9 is a true and correct copy of the Participants' *Emergency Motion for Status Conference* [ECF. 4180].

12. I declare under penalty of perjury that the foregoing is true and correct.

Solemnly affirmed and signed this 13th day of March, 2025, under the penalties of perjury.



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Christopher Johnson